

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:	)	
	)	Chapter 11
AMYRIS, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 23-11131 (TMH)
Debtors.	)	(Jointly Administered)
	)	

---

**VERIFIED STATEMENT OF THE AD HOC NOTEHOLDER GROUP  
PURSUANT TO BANKRUPTCY RULE 2019**

---

In connection with the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession (the “Debtors”), Paul Hastings LLP (“Paul Hastings”) and Blank Rome LLP (“Blank Rome” and together with Paul Hastings, “Counsel”) hereby submits this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with Counsel’s representation of an ad hoc group (the “Ad Hoc Noteholder Group”) of holders, or investment advisors, sub-advisors, or managers of discretionary accounts that hold the 1.50% Convertible Senior Notes due 2026 (the “Convertible Notes”), issued pursuant to the Indenture by and between Amyris, Inc., as issuer (“Amyris”), and U.S. Bank National Association, as trustee, dated as of November 15, 2021, and as amended, supplemented, amended and restated or otherwise modified from time to time.

1. On or around March 28, 2023, the Ad Hoc Noteholder Group retained Paul Hastings as counsel in connection with a potential restructuring of the Debtors<sup>2</sup>. Each member of the Ad Hoc Noteholder Group has consented to Paul Hastings’ representation.

---

<sup>1</sup> A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

<sup>2</sup> Blank Rome was recently retained as Delaware counsel for the Ad Hoc Noteholder Group.

2. The members of the Ad Hoc Noteholder Group are either the beneficial holders of, or the investment advisors or managers to, funds and/or accounts that hold disclosable economic interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names and addresses for each member of the Ad Hoc Noteholder Group, the amount of the disclosable economic interests held by each member of the Ad Hoc Noteholder Group, as of August 24, 2023 (as certified to Counsel by each member of the Ad Hoc Noteholder Group). The information contained in **Exhibit A** is based upon information provided by the members of the Ad Hoc Noteholder Group to Counsel and is subject to change.

3. As of the date of this Verified Statement, Counsel represents only the members of the Ad Hoc Noteholder Group and does not represent or purport to represent any persons or entities other than the Ad Hoc Noteholder Group in connection with the Chapter 11 Cases. In addition, as of the date of this Verified Statement, the Ad Hoc Noteholder Group does not, either collectively or through its individual members, represent or purport to represent any other persons or entities in connection with the Chapter 11 Cases.

4. The information contained in this Verified Statement and **Exhibit A** attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any member of the Ad Hoc Noteholder Group, including, without limitation, the right to assert, file and/or amend its claims in accordance with any applicable orders entered in these Chapter 11 Cases.

5. The information contained in **Exhibit A** is based upon information provided by the applicable members of the Ad Hoc Noteholder Group. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests

in the Debtors, except for claims for services rendered to the Ad Hoc Noteholder Group. The Ad Hoc Noteholder Group, through Counsel, reserves the right to amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

Dated: August 24, 2023  
Wilmington, Delaware

**BLANK ROME LLP**

*/s/ Stanley B. Tarr*  
Stanley B. Tarr (DE No. 5535)  
Lawrence R. Thomas III (DE No. 6935)  
1201 N. Market Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 425-6400  
Facsimile: (302) 425-6464  
Email: stanley.tarr@blankrome.com  
lorenzo.thomas@blankrome.com

-and-

**PAUL HASTINGS LLP**

Frank Merola, Esq.  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (310) 620-5700  
Facsimile: (310) 620-5899  
Email: frankmerola@paulhastings.com

-and-

**PAUL HASTINGS LLP**

John Storz, Esq.  
Matthew D. Friedrick, Esq.  
Caroline Diaz, Esq.  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: johnstorz@paulhastings.com  
matthewfriedrick@paulhastings.com  
carolinediaz@paulhastings.com

*Counsel to the Ad Hoc Noteholder Group*